

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION  
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BRADLEY  
TO PUBLIC REPRESENTATIVE INTERROGATORY PR/USPS-T6-9  
REDIRECTED FROM WITNESS MARTIN TO WITNESS BRADLEY  
(January 5, 2012)**

United States Postal Service witness Michael Bradley (USPS-T-10) provides a response to the above-listed interrogatory of the Public Representative dated December 21, 2011. The interrogatory has been redirected from Postal Service witness Cheryl Martin (USPS-T-6). The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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January 5, 2012

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TO PUBLIC REPRESENTATIVE INTERROGATORY  
REDIRECTED FROM WITNESS NERI

**PR/USPS-T-6-9**

Please refer to page 15 of your testimony which states: “The increase in cost for such diversion will depend on price charged by the carrier to transport the mail... Additionally, the diversion of such mail from surface to air transportation will increase the handling costs of such mail”. Please provide any analysis, including short-term or long-term projections, which estimate the costs charged by air transportation providers for increased use of the service. If such analysis has not been performed, please explain.

**RESPONSE:**

For an analysis of the additional air transportation costs please see page 29 of my testimony. As stated on page 30 of my testimony:<sup>1</sup>

Moving the mail from surface transportation to air transportation will cause the Postal Service to incur an additional \$124.9 million dollars in air transportation cost.

The details of this calculation are presented in the non-public Library Reference USPS-LR-N2012-1/NP6. The public version is presented in Library Reference USPS-LR-N2012-21.

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<sup>1</sup> See “Direct Testimony Michael D. Bradley on Behalf of the United States Postal Service,” Docket No. N2012-1, USPS-T-10, at 30.